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Via ECF

Hon. Thomas J. McAvoy Senior U.S. District Judge Federal Building & U.S Courthouse 15 Henry Street Binghamton, NY 13901

Re: <u>United States v. Delaney</u>

1:20-CR-000335-TJM

Update Regarding Restitution

Dear Judge McAvoy,

I represent the defendant, Jacob Delaney and the above matter. I write to advise the court that I have come to a proposed agreement with the counsel for the victims seeking restitution in this matter. Based on the representations of attorney Carol Hepburn, Esq., each victim will agree to receive \$3,000 for a total of \$12,000. Jacob's parents, Tom and Dina Delaney, have agreed to make that payment on behalf of their son. Since this is a conditional plea and an appeal to the Second Circuit is forthcoming, the agreement also contemplates that the Clerk's Office will hold the funds pending the outcome of the appeal.

Thank you for your attention to this matter.

Respectfully,

Iseman PLLC

By:

Scott Iseman Attorney

cc: All parties (ECF)

Carol Hepburn, Esq. (email)